

## SACCO & FILLAS LLP

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November 20, 2023

**VIA ECF**

Hon. Arun Subramanian  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: *Rodriguez et al v. Caridad Sea Food Restaurant Corp. et al*  
CASE #: 1:21-cv-06849-AJN

Your Honor:

This office represents Plaintiff. The parties jointly submit this letter pursuant to the Court's November 17, 2023, order. ECF No. 71. The parties completed discovery and mediation. The parties are still engaged in settlement discussions and have made significant progress since the mediation. To avoid a breakdown in settlement discussions, the parties respectfully request an **extension of two (2) weeks to December 4, 2023 submit a pre-motion and/or pre-trial letter.**

We thank the Court for the time and attention to this matter.

Respectfully submitted,

By: /s/ Clifford Tucker  
Clifford Tucker, Esq.

SO ORDERED.



Arun Subramanian, U.S.D.J.  
Date: November 21, 2023